



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

**MEMO ENDORSED**

September 8, 2020

VIA ECF

Hon. Katherine P. Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Urban Justice Center v. United States Citizenship and Immigration Services,*  
No. 20 Civ. 3691 (KPF)**

Dear Judge Failla:

This Office represents the government in the above-referenced action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552. I write on behalf of both parties to respectfully request an adjournment *sine die* of the initial pretrial conference presently scheduled for Wednesday, September 16, 2020, at 4:00 p.m. for the reasons discussed below.

The parties respectfully request the adjournment because the government sent a production of 314 records to the plaintiff on September 4, 2020, and the plaintiff wishes to have time to review the production and subsequently evaluate its litigation position, including whether the production could result in a consensual resolution to this case. Therefore, the parties respectfully submit that the proposed adjournment would promote the interests of judicial efficiency and conservation of resources. The parties further respectfully request that if the Court grants the requested adjournment, the Court also grant the parties leave to file a joint letter proposing next steps in this litigation by Friday, October 16, 2020, if the matter is not resolved by then.

This is the parties' first request to adjourn the initial pretrial conference.

We thank the Court for its consideration of this letter.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney  
Southern District of New York

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cc: Kyle A. Dandeleit, Esq. (via ECF)

Application GRANTED. The conference currently scheduled for September 16, 2020 is hereby ADJOURNED *sine die*. The parties are ORDERED to file a joint letter updating the Court on the status of this matter on or before **October 16, 2020**.

Dated: September 8, 2020  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE